

ROBERT GOSS, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

ROADRUNNER TRANSPORTATION
SYSTEMS, INC., MARK A. DIBLASI, and
PETER R. ARMBRUSTER,

Defendants.

CASE NO. 2:17-CV-0144

CLASS ACTION COMPLAINT
FOR VIOLATIONS OF
FEDERAL SECURITIES LAWS

JURY TRIAL DEMANDED

**MOTION OF BRYAN REIFSNYDER TO CONSOLIDATE RELATED ACTIONS,
TO BE APPOINTED LEAD PLAINTIFF, AND TO APPROVE
PROPOSED LEAD PLAINTIFF'S CHOICE OF COUNSEL**

CASE NO. 2:17-CV-0147

**CLASS ACTION COMPLAINT
FOR VIOLATIONS OF
FEDERAL SECURITIES LAWS**

VS.

JURY TRIAL DEMANDED

JURY TRIAL DEMANDED

CASE NO. 2:17-CV-0474

CLASS ACTION COMPLAINT FOR VIOLATIONS OF FEDERAL SECURITIES LAWS

VS.

JURY TRIAL DEMANDED

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Bryan Reifsnyder (“Mr. Reifsnyder” or “Movant”) respectfully moves this Court for an order: (1) to consolidate various related securities class actions¹ filed against Roadrunner Transportation Systems, Inc. (“Roadrunner” or the “Company”) and other defendants; (2) appointing Mr. Reifsnyder as Lead Plaintiff in this action pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”) (15 U.S.C. §§ 78j and 78t), as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”) (15 U.S.C. §§ 78u-4) and Securities and Exchange Commission (SEC”) Rule 10b-5 promulgated thereunder (17 C.F.R. § 240.10b-5); and (3) approving his selection of the law firm of Kahn Swick & Foti, LLC (“KSF”), as Lead Counsel for the Class.

Mr. Reifsnyder makes this Motion on the belief that he is the most “adequate plaintiff” as defined by the PSLRA because:

1. He has the largest financial interest in the relief sought by the Class; and
2. He satisfies the typicality and adequacy requirements of Fed. R. Civ. P. 23.

Mr. Reifsnyder further requests that the Court approve the selection of his counsel, KSF, as Lead Counsel for the Class. KSF is a nationally-recognized law firm with significant class action, fraud, and complex litigation experience, and is a firm with the resources to effectively and properly pursue this action.

WHEREFORE, for all of the reasons set forth herein and in the Memorandum of Law and the Declaration of Kim E. Miller in Support of the Motion of Bryan Reifsnyder to Consolidate Related Actions, to Be Appointed Lead Plaintiff and to Approve Proposed Lead Plaintiff’s Choice of Counsel submitted herewith, Mr. Reifsnyder respectfully requests that this

¹ The related securities class actions include *Goss v. Roadrunner Transportation Systems, Inc. et al.*, No. 17-CV-0144 (filed January 31, 2017) (the “Goss Complaint”), *Strougo v. Roadrunner Transportation Systems, Inc. et al.*, No. 17-CV-0147 (filed February 1, 2017) (the “Strougo Complaint”), and *Public Employees’ Retirement System of Mississippi v. Roadrunner Transportation Systems, Inc. et al.*, No. 17-CV-0474 (filed March 31, 2017) (the “MissPERS Complaint”).

Court: (1) Appoint Mr. Reifsnyder as Lead Plaintiff pursuant to Section 21D(a)(3)(B) of the Exchange Act; (2) approve Mr. Reifsnyder's selection of Lead Counsel for the Class; and (3) grant such other and further relief as the Court may deem just and proper.

Dated: April 3, 2017

Respectfully submitted,

/s/ Anne M. Plichta

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*Counsel for Movant Bryan Reifsnyder and
Proposed Lead Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that this Motion was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicate as non-registered participants on April 3, 2017.

/s/ Anne M. Plichta
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